

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware

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Attorneys for Defendants Conseco Life  
Insurance Company and Conseco Services, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOAN FREEMAN,

Plaintiff,

vs.

CANSECO LIFE INSURANCE COMPANY,  
CANSECO SERVICES LLC, and DOES 1  
through 20,

Defendants.

No. C06-06019 MJJ

**STIPULATION FOR DISMISSAL WITH  
PREJUDICE; [PROPOSED] ORDER**

Honorable Martin J. Jenkins

CONSECO LIFE INSURANCE COMPANY,

Counterclaimant,

vs.

JOAN FREEMAN,


Counter-Defendant.

Pursuant to Fed. R. Civ. P. 41, it is hereby stipulated, by and between plaintiff and counter-defendant Joan Freeman, defendant and counter-claimant Conseco Life Insurance Company, and defendant Conseco Services LLC, by and through their respective counsel of record, that the Court

1 may make and enter its Order dismissing this action in its entirety, including any and all  
2 counterclaims, with prejudice, each party to bear its own costs and fees.

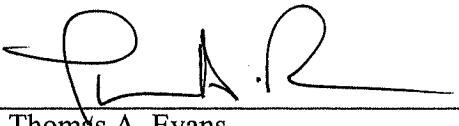
3 DATED: June 3, 2007.

4 LAW OFFICES OF DANIEL P. WHITE

5 By   
6 Daniel P. White  
7 Attorneys for Joan Freeman  
8  
9

10 DATED: June 4, 2007.

11 REED SMITH LLP


12 By   
13 Thomas A. Evans  
14 Attorneys for Conseco Life Insurance Company and  
15 Conseco Services LLC  
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**IT IS SO ORDERED:**

DATED: \_\_\_\_\_, 2007

  
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The Honorable Martin J. Jenkins  
UNITED STATES DISTRICT COURT JUDGE

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